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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant

No.: 14-CR-00175-WHA

**DECLARATION OF STEVEN M.
CAMPORA IN SUPPORT OF
ATTORNEYS PITRE AND CAMPORA'S
COMMENTS ON THE ACCURACY OF
PG&E'S RESPONSE**

Judge: Hon. William Alsup

1 I, STEVEN M. CAMPORA, declare:

2 1. I am an attorney with the Law Firm of Dreyer, Babich, Buccola, Wood, Campora LLP.
3 I have been involved with litigation, on behalf of fire and explosion victims and against Pacific Gas
4 and Electric Company, since 2008. I have taken the deposition of more than 200 Pacific Gas and
5 Electric Company officers and employees since 2008. I participated in the San Bruno Explosion
6 litigation, the derivative action against the Board of Directors, the Butte Fire JCCP, the CA North
7 Bay Fires JCCP and the Camp Fire litigation. I was a Liaison Counsel in the Butte Fire JCCP and
8 I am a member of the Plaintiffs' Executive Committee in the CA North Bay Fires JCCP.

9 2. Attached hereto as Exhibit A is a copy of relevant portions from the deposition of Stephen
10 Tankersley, taken on May 3, 2017.

11 3. Attached hereto as Exhibit B is a copy of relevant portions from the deposition of Stephen
12 Tankersley, taken on May 5, 2017.

13 4. Attached hereto as Exhibit C is a true and correct copy of Exhibit 52-006 to the Eric
14 Oldford deposition taken on November 30, 2018. Eric Oldford was produced by PG&E as the
15 Person Most Qualified on Audit Numbers identified in Plaintiffs' notice.

16 5. Attached hereto as Exhibit D is a true and correct copy of the Charles Filmer study which
17 clearly stated that trees which fell into the line (FPT) cause 90% of the vegetation related fires and
18 only 2% of the vegetation related fires and are caused by trees growing into the line (contact trees).

19 6. Attached hereto as Exhibit E are true and correct copies of relevant deposition testimony
20 of Dale Oldford, the person in charge of the Quality Assurance Audits.

21 7. Attached hereto as Exhibit F is a true and correct copy of the Declaration of Dr. Nicholas
22 Jewell, Plaintiffs' retained statistical expert. Using data from the 2014 audit, for the Stockton
23 Division, the site of the Butte Fire, Dr. Jewell was able to calculate the potential number of contract
24 trees and FPT.

25 8. Attached hereto as Exhibit G is a true and correct copy of the December 14, 2018
26 California Public Utilities Commission's Order Instituting Investigation and Order to Show Cause.

27 9. Attached hereto as Exhibit H is a true and correct copy of the relevant portion of PG&E's
28 Session D 2016.

1 10. On January 17, 2014 and again in August of 2014, Governor Brown declared a state of
2 emergency based on wildfire in California. Attached hereto as Exhibit I is a true and correct copy
3 of the State of Emergency proclamation.

4 11. Attached hereto as Exhibit J is a true and correct copy of relevant deposition testimony
5 of Erin Parks, a PG&E Program Manager for quality control.

6 12. Attached hereto as Exhibit K are relevant portions of deposition testimony of Geisha
7 Williams, taken on July 7, 2017.

8 13. Attached hereto as Exhibit L is a true and correct copy of relevant deposition testimony
9 taken of April Kennedy, taken on May 21, 2017.

10 14. Attached hereto as Exhibit M are relevant portions of deposition testimony of Brian
11 Biancardi, PG&E's Person Most Qualified to testify as to the dangers posed by FPT.

12 15. Attached hereto as Exhibit N are true and correct copies of relevant portions of deposition
13 testimony of Stephen Tankersley, taken on May 23, 2017. Ms. Tankersley was the former head of
14 Vegetation Management at PG&E.

15 16. Attached hereto as Exhibit O is a true and correct copy of relevant deposition testimony
16 of Eric Woodyard, a PG&E forester, taken on May 25, 2017. Mr. Woodyard specifically testified
17 that in fact PG&E was looking for green healthy trees which posed risk to the line.

18 I declare under penalty of perjury that the foregoing is true and correct of my own personal
19 knowledge. Executed this 28th day of February 2019 at Sacramento, California.

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Steven M. Campora